

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

FILED 05 NOV '18 13:20 USDJ-ORP

William X Nietzsche (solely as trustee for  
KRME International Trust),  
William Kinney Jr.,

Julie Ann Metcalf Kinney,

Plaintiff/Petitioner,

3:18-CV-1930-SI

Case No.

PLAINTIFF'S MOTION FOR A  
TEMPORARY RESTRAINING ORDER  
AND A PRELIMINARY INJUNCTION

v.

FREEDOM HOME MORTGAGE CORPORATION (FHMC),  
MORTGAGE ELECTRONIC REGISTRATION SYSTEMS (MERS),  
BENEFICIAL OREGON INC. (BOI),  
HSBC HOLDINGS PLC (HSBC),  
REGIONAL TRUSTEE SERVICES CORPORATION (RTSC),  
MTGLQ INVESTORS L.P. (MTGLQ),  
RUSHMORE LOAN MANAGEMENT SERVICES (RLMS),  
U.S. BANK NATIONAL ASSOCIATION (USBNA),  
CLEAR RECON CORPORATION (CRC),  
BARRISTERS SUPPORT SERVICES (BSS),  
URBAN HOUSING DEVELOPMENT (UHD),  
Et al.,

Defendant(s)/Respondent(s)

Plaintiff William and Julie Kinney ("The Kinney's"), by and through their son/trustee William X Nietzsche, hereby moves the court for (1) a Temporary Restraining Order enjoining Defendants from effectuating their purported non-judicial sale of Plaintiff's real property that took place October 23, 2018, and until the motion for Preliminary Injunction can be heard, and (2) a Preliminary Injunction enjoining Defendants from effectuating their purported non-judicial sale of Plaintiff's real property pending a trial on the merits.

Plaintiff has commenced this action by filing a Verified Complaint alleging specific performance, breach of contract, promissory estoppel and other claims for relief. This motion is supported by the Verified Complaint and exhibits thereto, the accompanying Memorandum, and the Declaration of William X Nietzsche.

WHEREFORE, Plaintiff requests that the court enter an Order:

1. Restraining Defendants from effectuating their purported non-judicial sale of Plaintiff's real property that took place October 23, 2018, and until the merits of Plaintiff's Motion for Preliminary Injunction are determined; and
2. Enjoining Defendants from effectuating their purported non-judicial sale of Plaintiff's real property pending a trial on the merits.

DATED this \_\_\_\_\_ day of November, 2018.

By Julie Ann Metcalf Kinney *Julie Ann Metcalf Kinney*  
Julie Ann Metcalf Kinney  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]

By William X Nietzsche *William X Nietzsche* *All Rights Reserved, Draft*  
William X Nietzsche, as trustee for KRME International Trust  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]